

# Exhibit E

AFFIDAVIT

I, COLETTE L. FORD, declare as follows:

1. I am a Senior Trial Attorney in the Office of International Affairs, Criminal Division, of the United States Department of Justice.

2. On February 23, 2016, the United States sent a supplemental request for assistance to Switzerland, pursuant to the 1973 U.S.-Swiss Confederation Mutual Legal Assistance Treaty, requesting that the Swiss Authorities deliver copies of the Warrants of Arrest *In Rem* issued by the District Court for the Southern District of New York to Lombard Odier Darier Hentsch & Cie Bank and Union Bancaire Privée in Switzerland.

3. On February 26, 2016, the Swiss Authorities informed me that they had provided copies of the Warrants of Arrest *In Rem* to Lombard Odier Darier Hentsch & Cie Bank and Union Bancaire Privée in Switzerland.

4. On March 7, 2016, the United States sent a supplemental request for assistance to Switzerland, pursuant to the 1973 U.S.-Swiss Confederation Mutual Legal Assistance Treaty, requesting that the Swiss Authorities deliver copies of the Verified Complaint for Forfeiture *In Rem*, Notice of Complaint of Forfeiture, and the Electronic Case Filing Rules & Instructions to any Swiss attorneys known by the Swiss Authorities to represent the potential claimants in conjunction with the Swiss criminal proceedings. The potential claimants were identified as Gulnara Karimova, Gayane Avakyan, Alisher Ergashev, Rustam Madumarov, Bekhzod Akhmedov, Shokrukh Sabirov, Sodikjon Sokhibjonov, Takilant Limited and Tozian in Switzerland.

5. The Swiss Authorities have informed me that they have identified the Swiss attorneys that represent the potential claimants identified in the United States' request. The

Swiss Authorities have confirmed that in order to notify these attorneys of the forfeiture proceedings in this case, the United States should send a mutual legal assistance request. The Swiss Authorities have informed me that they have requested that these attorneys accept delivery of the Verified Complaint for Forfeiture *In Rem*, Notice of Complaint for Forfeiture, and the Electronic Case Filing Rules & Instructions for the Southern District of New York. The Swiss Authorities have informed me that, in response to the Swiss Authorities' request, the Swiss attorneys representing the potential claimants have declined to accept delivery of these documents. The Swiss Authorities have informed me that they are unable to provide any further assistance to secure formal notification of the potential claimants, or their legal representatives. The Swiss Authorities have also informed me that they are unable to inform the United States of the identities of the Swiss attorneys or the potential claimants that they represent.

I declare, under the penalty of perjury, that the foregoing is true to the best of my knowledge.

Executed on June 21, 2016, at Washington, D.C.

A handwritten signature in black ink, appearing to read "Robert L. Ford", enclosed within a thin black rectangular border.